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23 June 2000

Mr. Mike Madigan, Chair Ms. Sunne McPeak, Vice-Chair Bay-Delta Advisory Council CALFED Bay-Delta Program 1416 Ninth Street, Suite 1155 Sacramento, CA 95814

RE. Suggested Modifications to the Preferred Program Alternative

## Dear Mike and Sunne:

We have reviewed the proposed recommendations from BDAC, developed pursuant to members suggestions from BDAC's final meeting last week, on the CALFED Preferred Program Alternative (PPA). We <u>cannot</u> support the general tenor of the recommendations. Specifically, it was our clear understanding the term "balancing" would be removed from recommendation #4. It was also our understanding that "ocean management" was to be deleted from the recommendations, pursuant to the request made by the U.S. Fish & Wildlife Service and others; instead it was interjected into recommendation #5. There has been and continues to be ocean management of our fisheries, including total closures of many of them; what we have never had is any effective management of the other factors affecting salmon production, specifically those inriver. We do, however, believe ocean monitoring of natural events may be useful to help in the assessment of success of in-river, in-Delta fish restoration measures.

Moreover, PCFFA, representing working men and women in the salmon fishery whose economy and livelihoods have been the most <u>adversely</u> impacted of any Bay-Delta stakeholder group, has concerns with some of the bullets in recommendation #11, and we continue to have serious concerns regarding CALFED's lack of vision and its timidness in addressing what we feel to be the major impediments to water reform, water reliability and environmental and fishery protection facing the state.

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Mr. Mike Madigan Ms. Sunne McPeak 23 June 2000 Page Two

Regarding recommendation #11, we feel the first bullet must also contain language requiring all Through-Delta conveyance systems to also comply with existing, specifically the salmon doubling requirements in state and federal statutes and the Endangered Species Act.

In the second bullet expertise must also include those with knowledge of fisheries and wildlife.

In the third bullet, the word "balanced" must be deleted and the first sentence should be reworded by striking everything following "Delta" and inserting in its place: consistent with the protection of fisheries and native wildlife.

Finally, recommendation #12 gets at the heart of our concern with the lack of vision in the CALFED process, specifically the failure to adequately look at new (not simply storing additional water from rain and snowmelt and changing natural flow patterns) water sources such as desalination which should prove promising given advances in technology and if planning is begun now. In addition to failing to consider new water sources, we are appalled at CALFED's failure to confront California's failure (along with Texas as the only other state to fail to do so) to implement a statewide groundwater management program, and a program for growth planning around water availability. It is our belief that new dams and reservoirs and an "is plated" water conveyance facility around the Delta (i.e., peripheral canal) are merely placebos for those still trapped in a 1950's-60's water development mentality; these will not solve California's water supply problems but simply exacerbate them by further environmental damage and depletion of fish and wildlife.

We wish to again thank you for your leadership of BDAC, but PCFFA cannot support the proposed recommendations as noted above.

Sincerely,

Pietro Parravano, President Member, Bay-Delta Advisory Council

cc: Ms. Mary Nichols, Secretary, Resources Agency

Mr. Robert Hight, Director, California Department of Fish & Game

Mr. Mike Speer, Regional Manager, U.S. Fish & Wildlife Service

Mr. Rod McInnis, Acting Regional Manager, National Marine Fisheries Service

Pacific Fishery Management Council